



GENERAL DIRECTORATE  
FOR THE PREVENTION OF  
MONEY LAUNDERING

# ANNUAL REPORT 2017



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REPORT**

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# MESSAGE OF THE GENERAL DIRECTOR

Dear readers,

It is my special pleasure to present to you the Annual Report of the General Directorate for the Prevention of Money Laundering (GDPML). Publishing this report is the key moment of informing the public of the broad activity, the achievements, the problems and the main objectives of work of the structure which I chair. Consequently, this publication embodies the high sense of responsibility and accountability towards every single citizen, who becomes closely familiar with the activity and performance of the GDPML for the strengthening of the preventive system in the country, protection of the financial system, improvement of security and intensification of non-compromised fight against phenomena and criminal activities that generate illicit income.

The past year has been one of the most dynamic and intensive years for our institution, as we have been facing important challenges and tasks which we have done our best to perform professionally, aiming at reaching the level of trust vested in us and focusing above all on the quality aspect, but also considering the quantifying aspect.

The evaluation process of the country by the CoE MONEYVAL Committee, the checks for the subjects of the law no.84/2016 "On the transitional re-evaluation of judges and prosecutors in the Republic of Albania", in the context of justice reform, the active participation in several task-forces and the inter-institutional action plans are some of our special commitments during the year which have been carried out concurrently with the serious and professional performance of our main functional duties including analysis of suspicious cases, dissemination and exchange of information with the law enforcement agencies and partner units, awareness raising and supervision of subjects in accordance with the requirements of the law and international standards of prevention of money laundering and financing of terrorism, etc.

Such intensive activity will continue throughout 2018 as well, aiming to improve further the analysis, the finalisation of the MONEYVAL Committee evaluation process, the preparation of the action plan for fulfilment of recommendations stemming from this process, the taking of measures to implement them, the consolidation of the risk-based supervision and the strengthening of cooperation and coordination with the supervisory authorities and law enforcement agencies not only for the day-to-day activities but also for the start of work concerning the National Risk Assessment of money laundering and financing of terrorism.

Everything mentioned above as well as everything that we intend to do, is dedicated to the intensive and tireless work and sacrifice of the GDPML personnel, which even though small in numbers, have managed to be successful and perform at the highest standards.

To conclude, I invite you to read this document and any comments or suggestions you might have to improve it, are more than welcomed.

Enjoy the reading.



**ARLIND GJOKUTA**



## ABBREVIATIONS

<b>FSA</b>	- Financial Supervisory Authority
<b>EU</b>	-European Union
<b>GDC</b>	- General Directorate of Customs
<b>GDPML</b>	- General Directorate for the Prevention of Money Laundering
<b>ASP</b>	- Albanian State Police
<b>GDT</b>	- General Directorate of Taxation
<b>DSCI</b>	- Directorate of Classified Information Security
<b>EGMONT</b>	- Group of Financial Intelligence Units in the World FATF - Financial Action Task Force
<b>HIDAACI</b>	- High Inspectorate of Declaration and Audit of Assets and Conflict of Interests
<b>CCFAML</b>	- Committee for the Coordination of the Fight Against Money Laundering
<b>CoE</b>	- Council of Europe
<b>MONEYVAL</b>	- Committee of Experts on the Evaluation of Anti-Money Laundering Measures
<b>FIU</b>	- Financial Intelligence Unit
<b>OSCE</b>	- Organisation for Security and Cooperation in Europe
<b>PEP</b>	- Politically Exposed Person
<b>GPO</b>	-General Prosecutor's Office
<b>ML/FT</b>	- Money laundering and financing of terrorism
<b>AML/CFT</b>	- Anti-money Laundering countering financing of terrorism
<b>NBC</b>	- National Business Centre
<b>SAR</b>	- Suspicious Activity Reporting
<b>CTR</b>	- Cash Transaction Report
<b>SPAK</b>	- Special Anti-Corruption Structure USA- United States of America
<b>SIS</b>	- State Intelligence Service
<b>IT</b>	- Information Technology
<b>DCM</b>	- Decision of the Council of Ministers
<b>CEO</b>	-Currency Exchange Office
<b>CIPRO</b>	-Central Immovable Property Registration Office
<b>UNODC</b>	- United Nations Office on Drugs and Crime



# INTRODUCTION

**The GDPML Activity Report 2017 presents concise data on its main developments, as the Albanian FIU.**

The activity of this year is characterized by further consolidation of technical capacities and human resources, intensification of cooperation with institutions involved in AML/CFT in the country and abroad, participation in plenary meetings and other activities of the MONEYVAL Committee (CoE), the EGMONT Group as well as the FIUs in the region.

An important part of the activity of the GDPML during 2017 has been engagement both in the preparation of the legal and sub legal acts in the context of justice system reform as well as in the specific contribution to the process of transitional background check of judges and prosecutors.

The GDPML is the co-ordinator of the Vth evaluation round of the country by CoE MONEYVAL Committee, which has demanded constant commitment and coordination in completing the questionnaires. The climax of this evaluation was the visit of a group of experts on 02-12 October 2017.

The aim of this process is not only the overall reflection of the approximation of the legal and institutional framework of the country with the FATF Recommendations, but also the evaluation of the extent of the country's effectiveness as regards their implementation, through 11 "immediate outcomes".

Overall, the GDPML has attained the objectives set for 2017 and it has contributed to further consolidation of AML/CFT in the country. Regarding the exercising of the functions set by law, this year is characterized by a dynamic and multidimensional activity which aims at strengthening the prevention system and safeguarding the integrity of the financial system.

Thanks to the support of the Albanian Government during the year, the GDPML personnel structure increased to 39 employees from 28 that it was in 2016. Such assessment and confidence of the government stems from the commitment of the personnel of the institution and the proactive role that it has played not only for AML/CFT, but also the fight against other financial crimes.

# MAIN ACTIVITIES

The last year was a challenge for the GDPML as in addition to the analysis of suspicious cases, supervision of the reporting subjects, exchange of information with the partner FIUs and law enforcement bodies that constitute the core activity, the institution has played a key role in important processes, including:

- Evaluation of MONEVAL Committee;
- verification in the framework of the process of transitional evaluation of judges and prosecutors, known as “vetting”;
- participation in several “tasks-forces” focusing on the fight against organised crime and narcotics.

## CoE MONEYVAL Committee Evaluation Process

Albania, as a member of the CoE MONEYVAL Committee, is in the process of evaluation, within the V round of mutual evaluations.

The aim of the Committee is to ensure that its members have effective AML/CFT systems in line with international standards and conventions such as: FATF recommendations, UN conventions and CoE conventions concerning the fight against trafficking of narcotics, terrorism and its financing, organized crime, money laundering, etc.

This process started in 2016 and it will continue until the adoption of the final report in 2018. This evaluation is of importance as it serves as a reference point for AML/CFT issues from the EU, the US Department of State and other important international bodies.

As a coordinating institution, GDPML has played an important role throughout this process, starting with early preparatory stages, processing of inputs, organizing of meetings, providing comments and addressing various expert group questions. Preparation for this process requires the co-ordination of the input of more than 20 institutions and 60 meetings with over 200 persons, institutions and private entities during the on-site visit.

On February 13, 2017, the CCFAML was convened under the chairmanship of the Prime Minister, and the final outcome was the Order of the Prime Minister no. 1 dated 21.03.2017 "On the coordination of work of public institutions for MONEYVAL evaluations and other similar bodies evaluations". Such order stipulates that the GDPML's duty is to coordinate and collect data from all public institutions in the framework of fulfilment of FATF Recommendations.

The following were the participants of the meetings, members of the Committee: Minister of Finance and Economy, Minister of Foreign Affairs, Minister of Defence, Deputy Minister of Internal Affairs, Minister of Justice, General Director of Prevention of Money Laundering, Prosecutor General, Governor of the Bank of Albania, Deputy Director of SIS and Inspector General of HIDAACI.

The Committee examined the GDPML's report concerning the effectiveness of the preventive system and implementation of the criminal law against money laundering.

Among other things, it was approved the amendment of the 2004 Regulation of this Committee, amendments which aimed at the inter-institutional coordination for the periodic review of the National Risk Assessment and measures to minimize risk, as well as ensuring proper representation of the country in the evaluation processes by international monitoring institutions and bodies.

## Justice reform and vetting process

Within the justice reform, vetting in the judicial system is considered a priority for the Albanian authorities and to this end it has been fully supported by the EU and the USA. This process consists in the transitional evaluation of judges and prosecutors both in terms of assets and the professional aspect and the decisions taken by them.

In this regard, FIU's GDPML's role is of paramount importance, as it is involved in: on-going verification and checks conducted for a very broad category of persons and their family members, for re-evaluation of judges and prosecutors. Moreover, with the establishment of new structures, GDPML is included in: on-going monitoring of transactions for the whole SPAC structure, conducting verification of transactions on behalf of the Special Prosecutor's Office, etc.

Specifically, during 2017, following HIDAACI requirements, GDPML made verifications in the database and replied within 30 days for about 3000 persons (prosecutors, judges and family members), this being a labour intensive process for the institution, considering that a comparable number of persons has been verified during the entire year on behalf of the ASP and GPO.

## Task force participation and action plans

GDPML has constantly provided its input within the Task Force countering criminal activities and electoral crimes and it has actively participated in the drafting and implementation of relevant action plans.

In line with the objectives set by the Albanian Government to eradicate the phenomenon of cultivation and trafficking of cannabis in the DCM no. 248 dated 29.03.2017 “On the approval of the action plan against cultivation and trafficking of cannabis 2017 -2020”, GDPML participates in the Central Task Force (CTF) established to this end.

GDPML's proactive action directly in the implementation of this action plan consists in enhancing awareness of reporting entities regarding suspicious cases related to the use of cash or potential transactions used as illegal instruments to this end, as well as further strengthening of inter-institutional cooperation with law enforcement and intelligence agencies.

Given the fact that 2017 was an election year, measures were undertaken at national level to prevent illegal financing of political parties and monitoring of their activity.

In this framework, DCM no. 473 dated 01.06.2017 “On the taking measures and monitoring of the activity, behaviour or use of human, financial and logistical resources of the public administration during the election process for the 2017 parliamentary elections”, was approved which set out objectives for GDPML. To assess this process, GDPML has circulated advisories to banks and other reporting entities, to heightened alertness over transactions executed on behalf of political parties, other transactions, mainly those in cash, intended for vote buying or anomalous transactions with candidates.

GDPML has participated in several inter-institutional meetings and it has provided its contribution “On the approval of the Action Plan 2017-2020 for the Implementation of the Cross-cutting Strategy against Organized Crime, Illicit Trafficking and Terrorism”, emphasising issues such as

- The extension of GDPML's access to several state databases;
- The need to address and take measures to lower the risks identified in the National Risk Assessment.

Several meetings of the Inter-Institutional Technical Working Group on the Prevention of Money Laundering and Financing of Terrorism, were chaired by General Director of GDPML during 2017.

Experts from the following institutions have attended these meetings: Ministry of Finance and Economy, Ministry for Europe and of Foreign Affairs, Ministry of Internal Affairs, Ministry of Defence, General Prosecutor's Office, Bank of Albania, HIDAACI, State Intelligence Service and General Directorate of State Police.

Among the main issues the following has been addressed: inter-institutional cooperation, amendments to the law on AML/CFT, reporting on international activities, AML/CFT national risk assessment, justice reform, etc.

# COLLECTION, ANALYSIS, DISSEMINATION OF FINANCIAL INFORMATION AND FREEZING INJUNCTIONS



Collection, analysis and dissemination of suspicious cases to law enforcement agencies are some of the core functions of the GDPML as the Albanian FIU.

In accordance with the AML/CFT law, but also with the best international standards and practices, the basis of the preventive system is the suspicious transaction reporting from a broad range of reporting entities and state institutions. Their ensuing analysis leads to a decision whether or not to disseminate them to the law enforcement institutions for further follow-up or results in the issuing of freezing orders.

The comprehensive analysis of the statistical data presented hereunder, points out to a further consolidation of the preventive system in the country, consisting of:

- a higher number of SARs submitted by the reporting entities, compared to the previous years;
- an increase of the percentage of assets seized by the Prosecution/Court, in relation to the funds frozen by GDPML, which indicates the highest level reached in the last 5 years;
- a higher number of cases whereby reporting entities have requested instructions, on whether or not to perform transactions;
- maintaining the same trend of the number of cases disseminated to the law enforcement bodies.

## Suspicious Activity Reports

As already mentioned SARs submitted to GDPML by the reporting entities, constitute the basis of work of the institution. These reports, inter alia, indicate a higher level of legal knowledge on their part as well as awareness concerning the measures to be taken

During 2017, there was a 7% increase of the number of SARs submitted by the reporting entities, compared to the previous year, while at the same time the highest number of SARs was recorded since GDPML's establishment.

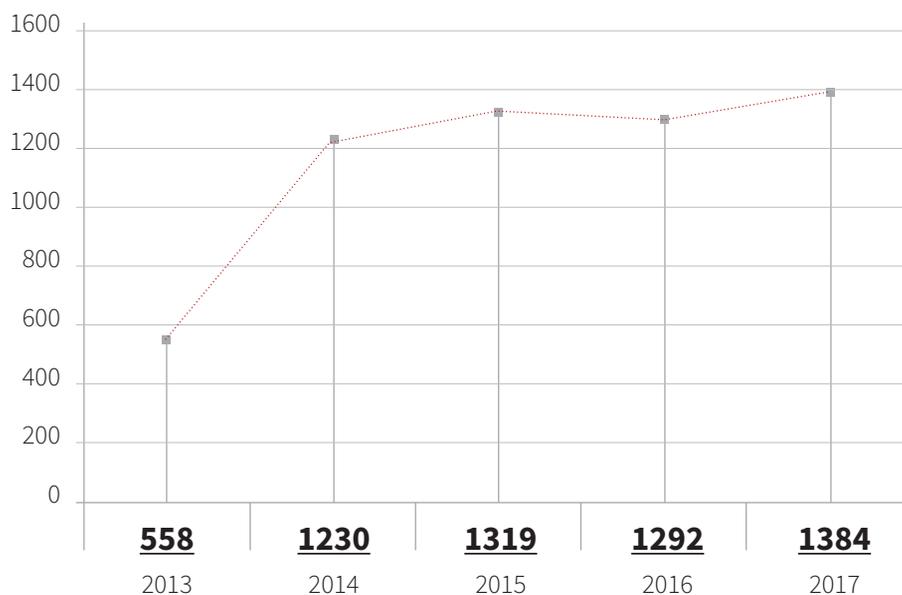
Table 1: Reported SARs, by category of reporting subjects (2013-2017):

Reporting subject	Year 2013	Year 2014	Year 2015	Year 2016	Year 2017
Banks	420	822	585	619	686
Money Transfer company	45	74	79	209	165
GDC	36	48	45	47	46
GDT	10	50	7	3	5
CIPRO	20	64	210	134	83
Notary public	15	122	303	205	254
CEO	8	16	17	14	20
Accounting company	1	0	0	1	0
Certified experts	1	4	1	0	0
Non-Bank Financial Institution	0	2	0	2	10
Lawyers	1	2	0	0	0
Financial lease company	0	4	7	15	5
Construction company	0	4	1	0	5
Car dealers	0	9	36	35	101
Travel Agency	0	0	1	0	0
Savings and Loan Association	0	0	1	0	0
Transportation company	0	0	2	0	0
e-payment company	0	0	19	6	2
Other	1	9	5	2	2
<b>Total</b>	<b>558</b>	<b>1,230</b>	<b>1,319</b>	<b>1,292</b>	<b>1,384</b>

The increasing number of reports is a significant indicator of effectiveness of GDPML concerning:

- Training and awareness raising of reporting subjects;
- Risk-based supervision and concentration of resources on entities of medium and high risk;
- Interaction with the reporting entities, by providing feedback and circulating best practices;
- On-going cooperation with the supervisory authorities;
- Administrative sanctions to increase entities' legal compliance.

*Graph 1: Progress of SARs reporting in 2013-2017.*



SARs submitted by banks constitute 49.5% of the total SARs, which is an expected percentage considering that the banks are the main stakeholder in the preventive system in the country, followed by the notaries with 18.3%, money transfer companies with 12% and car dealers with 7.2%.

On the other hand, by analysing SARs content-wise, one can clearly note an increase of:

- reporting of transactions involving PEPs or other categories considered as high risk;
- reporting of attempted transactions;
- alertness over cash transactions;
- reporting concerning the loan/ debt agreements.

Table no.2 presents data for the period 2013-2017, as regards the main information which served as indicia for the SARs.

Data shows that SARs typologies over the years have maintained the same trend, thus being the most important indicia of cases referred to the law enforcement bodies, with the prevalence of: suspicious transfers (both through the bank system and the transfer companies), high value cash disbursement, movable/immovable property purchase by means of unknown sources of funds, as well as sponsorship/donations/loan by/to third parties etc.

The typology of these reports is on the same line as the risks identified in the national risk assessment and various sector analysis made by the GDPML. An extension of the focus of analysis conducted by some of the categories of the reporting entities is observed, as they include not only frequent and high value transfers, but also suspicious cases of transfers to countries which are considered to be risky for trafficking of narcotic substances or indicated in the public statements of FATF and cases of involvement of persons who have criminal records in these transactions.

Table 2: Main typologies of SARs for the period 2013 -2017.

Reporting subject	Year 2013	Year 2014	Year 2015	Year 2016	Year 2017
Suspicious transfers	189	282	351	387	369
Use of individual account for business purposes/fiscal evasion	44	407	52	14	52
Cash disbursement of considerable amounts	96	112	105	143	190
Transactions beyond the client's profile	60	55	74	95	86
PEPs involvement in transactions	0	10	4	4	15
Declaration/non-declaration of values at the border	23	48	21	48	44
Allegations of terrorist financing	4	8	6	29	12
Sponsorship/donations/loan by/to third parties	18	42	102	88	124
Real estate acquisition with unknown source of funds	29	142	421	258	194
Movable property acquisition with unknown source of funds	0	16	51	57	120
Non-identification of beneficiary owner	1	3	0	1	0
Attempted transactions	26	23	12	17	34
Transactions made by NPOs	4	5	11	7	8
Performance of a fictitious economic activity	5	2	1	1	1
High value currency exchange	0	10	17	16	17
Use of banking instruments with anomalies/forged (credit letter/cheque . etc)	4	3	0	2	6
Suspicious use of bank loans	8	9	10	8	4
Fraud / cyber crime	4	13	5	12	16
Actions by persons alleged to be involved in criminal activity	9	15	12	76	45
Allegations concerning activities of import/export of commodities	13	0	32	0	0
Transactions made by/to companies of games of chance	2	3	4	0	2
Other	19	22	28	29	45
<b>Total</b>	<b>558</b>	<b>1,230</b>	<b>1,319</b>	<b>1,292</b>	<b>1,384</b>

## Analysis and referral to the law enforcement bodies

The process of information analysis is based on the valuable experience gained over the years in the GDPML, but also on the best international experience and practice. The evolution of these practices is considered through active participation in various regional and international meetings, which are then reflected in the work process of the GDPML.

Two main pillars guide the analysis and processing of data and information collected by GDPML:

- First, prioritisation of reporting and information obtained based on the suspicious indicia and the needs to issue freezing orders;
- Second, interaction with the reporting subjects to improve the quality of SARs, the constant communication with the law enforcement institutions and the coordination of activities to make possible assets seizure/confiscation and prosecution of persons involved in a criminal activity.

SARs submitted by the reporting entities undergo an analysis process by the GDPML and where suspicious elements of laundering of proceeds of crime or financing of terrorism have been identified, they have been disseminated to the law enforcement agencies for further investigative actions.

Table 3: Cases disseminated to the law enforcement bodies during 2013-2017

	Year 2013	Year 2014	Year 2015	Year 2016	Year 2017
Disseminations to the prosecution office	35	148	120	120	131
Disseminations to ASP	248	314	281	291	270
<b>Total</b>	<b>283</b>	<b>462</b>	<b>401</b>	<b>411</b>	<b>401</b>

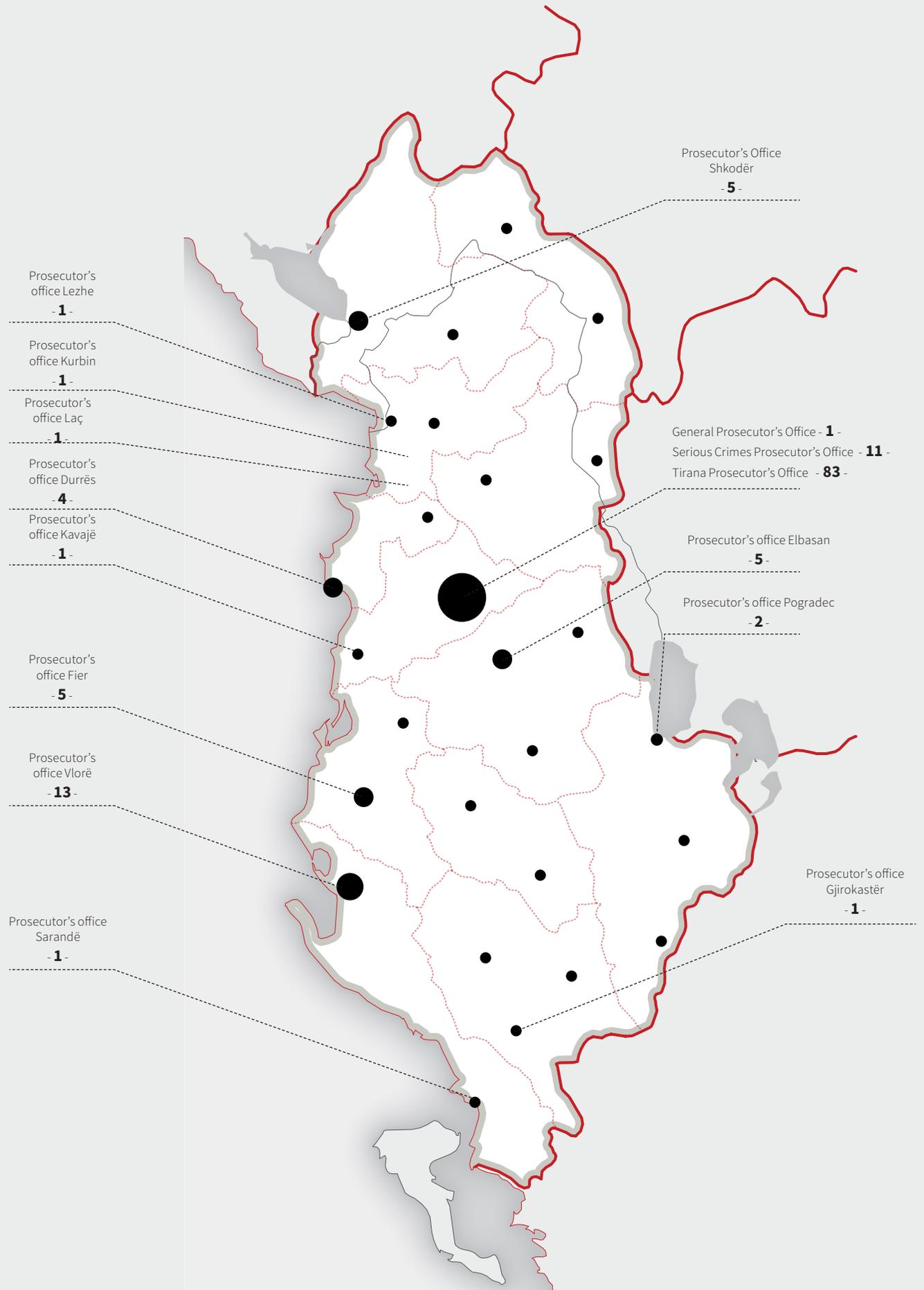
Not only has the GDPML disseminated such information, but it has also, on constant basis, enriched it with additional data or suspicious elements, that have been an added value for the activity of law enforcement institutions and have contributed to the proceedings initiated by them.

The analysis of 2017 statistics points out that the number of disseminations to the prosecution office has been increasing and the reason behind this is the fact that GDPML have managed to identify the predicate offence, or it has obtained such indicia-based information which, in our judgement, require the immediate initiation of criminal proceedings or the need to seize/confiscate funds.

Information and analysis on suspicious activities is usually sent to the ASP to be completed with additional information and conduct investigation in accordance with the legal provisions, and then refer them to the prosecutor's office according to the procedural actions.

The geographical extent of information sent to the prosecutor's office has been quite broad, covering the entire territory of the country, while the main concentration is understandably in districts with a higher level of economic development.

Graph 2: Geographical distribution of disseminations to the prosecution office in 2017



Graphic presentation of the dissemination of cases sent to the Prosecutor's Office shows that the higher number of cases is referred to the Judicial District Prosecutor's Office of Tirana, followed by those of Vlorë, Elbasan and Fier.

Concerning indicia over which cases sent to the law enforcement agencies have been initiated, it results that SARs from the subjects of law are the main source, and this implies not only the increasing number, but also their significant quality improvement.

Table 4: Indicia for the cases sent to ASP/prosecution office during 2017

	<b>SAR</b>	<b>Sector analysis</b>	<b>CTR</b>	<b>FIU partner</b>	<b>Notifications</b>	<b>Total</b>
Disseminations to the prosecution offices	105	8	3	1	14	131
Disseminations to the police	235	7	10	2	16	270
<b>Total</b>	<b>340</b>	<b>15</b>	<b>13</b>	<b>3</b>	<b>30</b>	<b>401</b>

During the process of analysis of suspicious cases, special importance is paid to the identification of mechanisms used for the laundering of proceeds of crime or financing of terrorism. In this regard, the following typologies have been observed throughout the years:

- unusually high circulation of funds compared to the financial profile of the subject;
- disbursement or withdrawal of high and unjustified value;
- considerable investments in real estate by means of unknown sources of funds;
- suspicious transfers (incoming or outgoing) involving subjects/foreign citizens and transfers which are not justified by the supporting documentation;;
- suspicious transfers with countries considered of risk, persons with criminal record or suspects of përfshirje involvement in criminal activity, without clear or declared links between the parties, etc.;
- lending/borrowing or donations of unusually high value between natural or legal persons;
- financial transactions made by persons who have past criminal record or persons related to the formers;
- fraudulent actions of various forms;
- non-declaration of amounts and valuable items at the border, etc.

In addition to the typologies used, the identification of the source of criminal funds/assets and their connection with the illicit activities is of high importance for a successful financial investigation.

Table 5: Data on classification of predicate offence during 2013-2017

<b>Predicate offence</b>	<b>Year 2013</b>	<b>Year 2014</b>	<b>Year 2015</b>	<b>Year 2016</b>	<b>Year 2017</b>
Trafficking of narcotic substances	18	50	48	30	43
Trafficking in human beings/ exploitation of prostitution	4	9	6	7	2
Past criminal record	3	15	16	10	8
Establishment/involvement in criminal organisations	1	-	6	6	5
Financing of terrorism	1	3	2	8	5
Fraud / financial fraud cybercrime	17	17	12	17	15
Forgery	3	3	8	2	5
Abuse of office or mainly passive corruption	7	7	11	9	13
Non-declaration of amounts and valuable items at the border	-	4	14	2	1
Suspicion of fiscal evasion	29	40	41	9	16
Theft, robbery, threat, murder consequence	2	12	8	3	7
Trafficking of motor vehicles /customs duties diversion Smuggling	3	2	2	4	-
Money laundering involving persons who have criminal record or over whom there is suspicion money laundering	2	-	4	2	9
unknown	196	300	224	302	272
<b>Total</b>	<b>286</b>	<b>462</b>	<b>402</b>	<b>411</b>	<b>401</b>

During 2017, the possible link with the underlying criminal activity suspected of having generated the funds circulated or invested was identified in 33% of cases. The highest number of cases where the identification of the predicate offence has been possible corresponds to the trafficking of narcotic substances, fiscal evasion and fraud. It is observed an increase of alleged cases of abuse of office or corruption, which has marked the highest number at least in the last 5 year period.

## Freezing orders

To prevent alteration of proceeds of crime or their use for financing of terrorism, where there are enough facts and data to show that this is happening or might happen, the GDPML enforces the right to freeze transactions and assets, temporarily, for 72 hours.

During 2017, 52 freezing injunctions were issued mostly for bank accounts, amounting to approx. 11.2 million EUR, of which 9 million EUR have been seized by decision of the Prosecution/Court.

Table 6: Freezing injunctions and seizure orders (in EUR) during 2013-2017

Years	no.of freezing orderss	Total Frozen	Total seized	Seized/ Frozen Ratio
2013	15	881,670	213,500	24.2%
2014	65	18,183,760	13,967,770	76.8%
2015	47	16,278,080	11,266,941	69.2%
2016	61	28,772,733	8,129,000	28.3%
2017	52	11,263,587	9,096,233	80.8%

As table data show, the amount seized compared to the amount frozen by the GDPML has increased. During 2017, 80.8% of the amount frozen by the GDPML was seized, and this figure constitutes the highest percentage of the last 5 years.

# TYOLOGY OF CASES REFERRED TO THE LAW ENFORCEMENT BODIES

In order to further enhance the preventive capacity building of the reporting entities, several ML/FT typologies are presented hereunder, that have been within the scope of GDPML's core functions.

## Typology 1

**Transfers from  
companies registered  
in tax haven countries,  
to the account of “call  
centre” companies  
immediate withdrawal of  
funds**

Company A which scope of activity is “call centre”, had received in one of its bank accounts in the country, as of the start of its activity, several transfers sent from E.U country by companies registered in tax haven countries (different from the country of transfers).

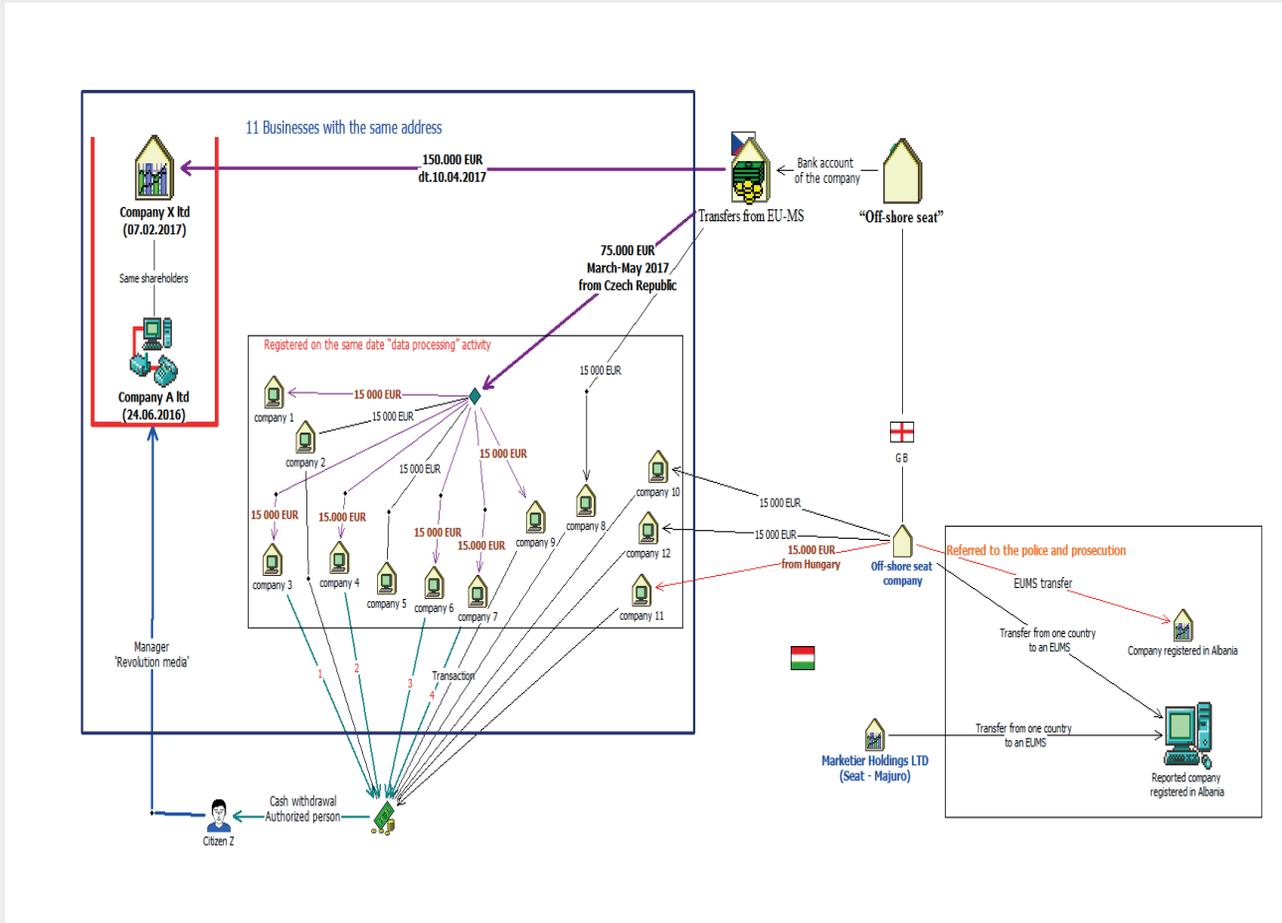
The verification finds that:

Several small businesses, natural persons (about 11 natural persons) with the same scope of activity as Company A, had registered with the NBC the seat of activity in the same address of Company A and on the same date as Company A. These businesses were registered under the name of company employees and they were of a very young age.

The analysis of these businesses accounts finds incoming transfers, from the moment they were registered, from the same company that had made transfers previously even to Company A.

The incoming funds in the small businesses accounts have been almost of the same amount (10.000--15000 EUR per transfer) and these funds have been withdrawn immediately by citizen Z who was a person authorised for transactions in the small businesses, natural persons, as well as employed as manager of company A.

During the further analysis of the case, it has been found that the sending companies abroad have been connected to other companies in Albania which scope of activity is “call centre”, newly established companies and which partner is a young national, and consequently, information has been sent to the law enforcement agencies of the suspicion concerning the activity performed by them.



- Based on suspicion that:
- the funds transferred to the account of newly established businesses are withdrawn in cash by an authorised person, citizen Z who is employed by Company A;
- the country from where funds are transferred is different from the country of the seat of activity of the sending company;
- several considerable amounts are transferred within a short period of time;
- several businesses are established on the same date, same address and based on the same scope of activity.

GDPML has informed the law enforcement agencies for further investigation of the case.

## Typology 2

### Transfers made with Latin American country by citizens with persons sentenced for trafficking of narcotic substances

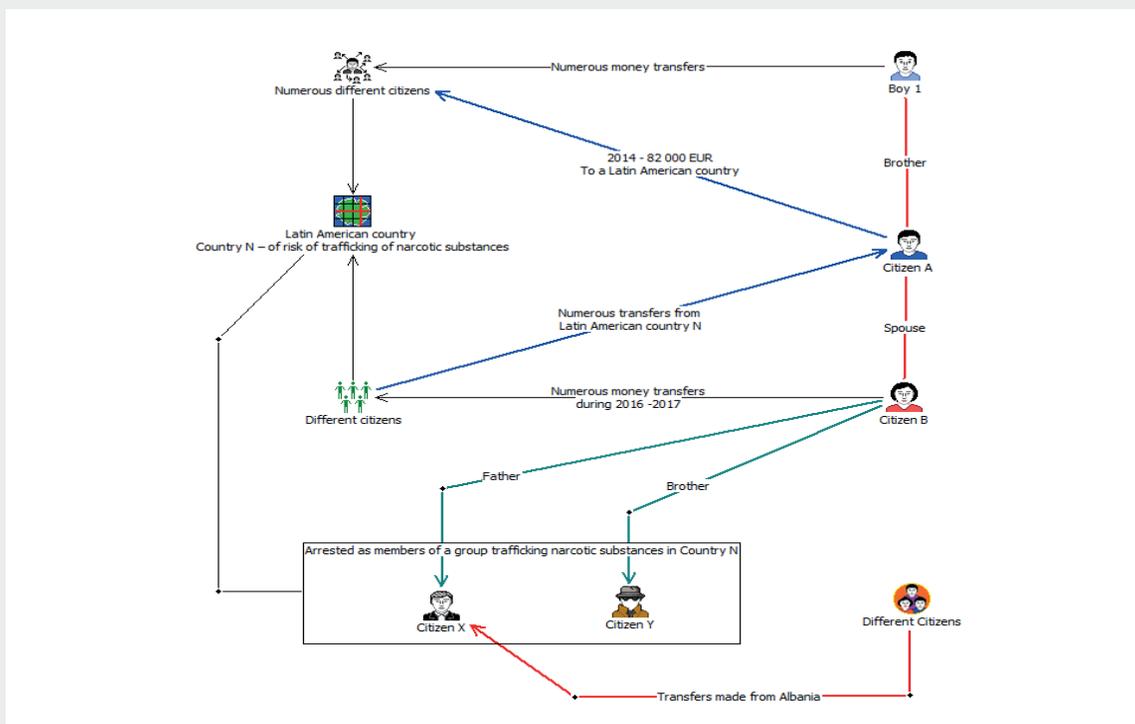
During a 2-year period, citizen A has received many transfers from different citizens in a Latin American country, Country N, but it was found that during a 6-month period (in 2014), citizen A had made some 20 transfers, amounting to 82.000 EUR to different citizens in this country.

The relations between citizen A and sending/beneficiary citizens were unclear, transfers were made with high risk countries related to the trafficking of narcotic substances, and consequently the case was disseminated for further verification to the law enforcement bodies.

1. The brother of citizen A as well as the spouse of citizen A (citizen B) had made several transfers to Country N for a period of 2 years.
  - transfers mainly amounted to 200-1.000 EUR, but also smaller amounts of 20 EUR/transfer;
  - transfers were very frequent, 18-20 transfers per month and to the account of different citizens.

The verification conducted over the close relatives of the spouse of citizen A, her brother and her father, point out that:

2. Citizen X (father of citizen B) had received several transfers from Albania to Country N.
  - According to open sources, in the past, citizen X had been arrested for trafficking of narcotic substances.
3. Citizen Y (brother of citizen B):
  - had escaped from the prison, after being sentenced to 25 years of imprisonment for the murder of a police officer;
  - had been arrested in a non-European state for theft and trafficking of narcotic substances;
  - had been arrested in Country N, as part of a group trafficking narcotic substances.



## Typology 3

### Circulation of suspicious amounts in the banking system

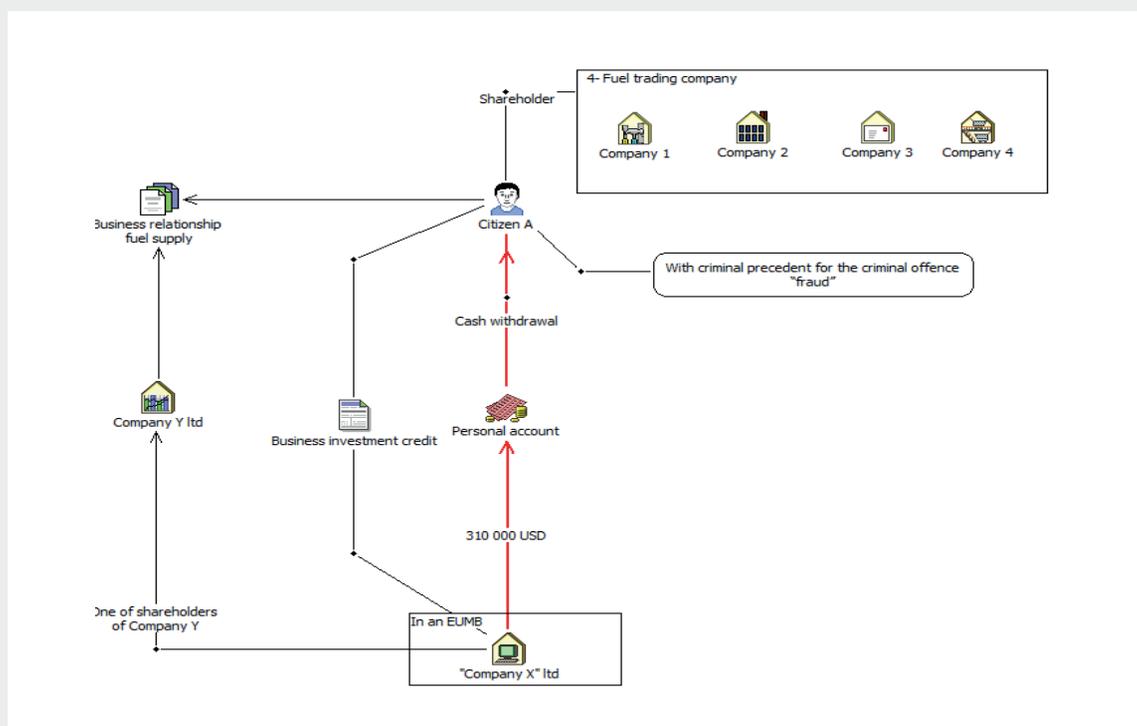
Citizen A has a personal account in a second level bank as of 2015 and in 2017 he receives a transfer amounting to 310.000 USD from company X, from an EUMS, and he had withdrawn the amount without giving any information of the source of the funds, the sender or the purpose of the transfer.

The verification finds that:

- company X that has made the transfer above is one of the shareholders of Company Y, registered in Albania, and citizen A is in a business relationship with the former considering that it supplies it with fuel, and because of this relationship, it has requested a loan amounting to 310.000 USD for business investment;
- according to the NBC information, citizen A is a shareholder in four companies, which operate in the same field of activity;
- during the period that Citizen A is involved with these subjects (2011-2017) he has circulated a considerable number of high value bank transactions, which are mainly of business nature;
- according to open source information, the citizen has been arrested of fraud.

The analysed information has been sent for further inquiry to the law enforcement bodies, and the latter confirmed that citizen A has criminal record for the criminal offence “fraud” and the security measure of “arrest in prison” is imposed against him.

Based on these indicia, GDPML has issued a freezing order. A criminal proceeding has been recorded against the citizen and the amount of 310.000 USD has been seized.



**Typology 4**  
**Income**  
**generated**  
**from illicit**  
**activity**

04

Citizen A has made a bank deposit in the amount of 80 000 EUR, declaring as a source the income from emigration.

At the same period and at the same bank, citizen X (son-in-law of citizen A) opened a joint account with the spouse Citizen B, where he deposited the amount of 65 000 EUR as family savings and emigration income in an E.U country. No supporting document has been submitted in relation to the deposits.

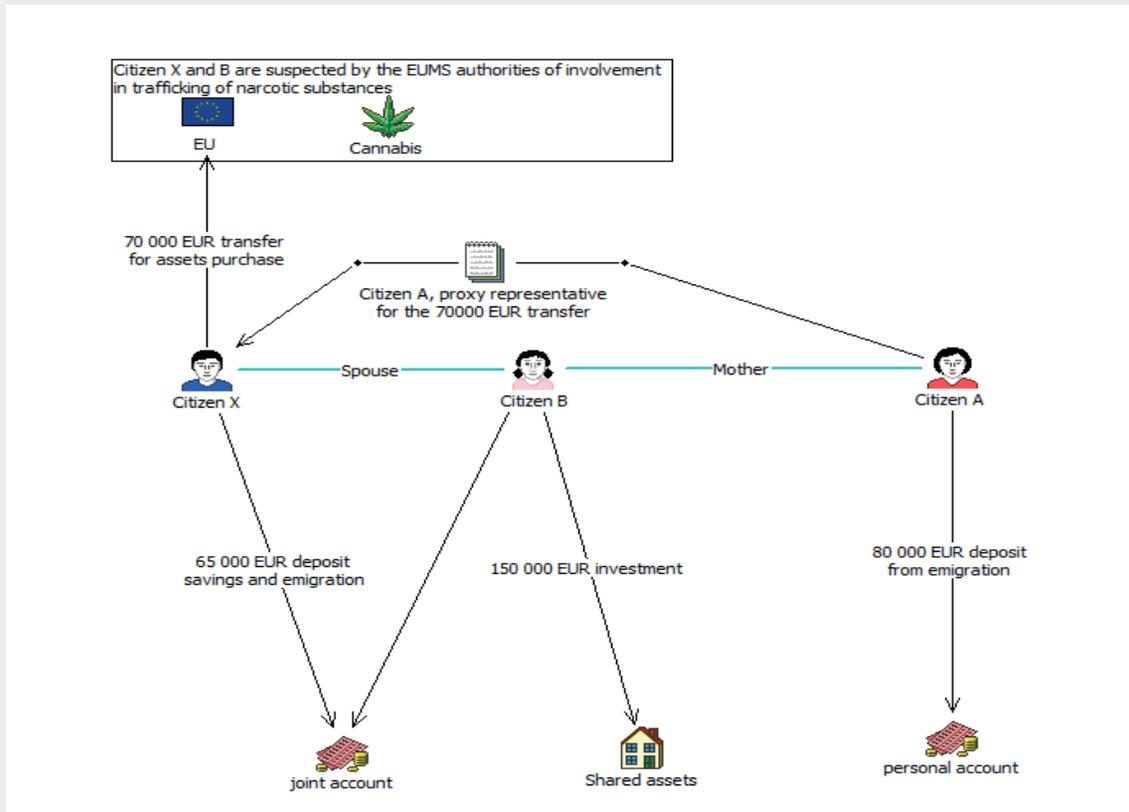
Upon further verification it was found that:

- citizen B has invested in real estate the amount of 150 000 EUR;
- no business is registered with the NBC;

Concerning citizen X, GDPML requested information from the law enforcement bodies and was subsequently informed that citizen X and B are suspected in an E.U country M, as persons involved in trafficking of narcotic substances.

The bank information indicated that citizen X, represented by citizen A, through a power of attorney, had transferred 70 000 EUR to country M, intended for a house purchase.

Afterwards, the information was disseminated to the law enforcement agencies and a freezing order has been issued that was later on followed with a seizing order.



# AWARENESS RAISING AND COMPLIANCE ANALYSIS

## Awareness raising of reporting entities

Awareness-raising and training of reporting entities is considered not only a legal obligation of the GDPML, but also an important and multidimensional process which is closely linked with the quality and quantity of the reporting of suspicious cases, as well as the constant cooperation, having a tangible impact on the success of cases analysed and disseminated to the law enforcement agencies.

Table 7: Number of trainees within the subjects during 2013-2017.

Subject	Number of trainees				
Year	2013	2014	2015	2016	2017
Banks	84	120	285	108	364
CEO	151	70	73	77	35
Non-Bank Financial Institution	0	68	115	188	115
Games of Chance	15	12	0	6	3
Notary public	75	237	73	127	30
Certified expert	63	1	0	1	3
Insurance Company	0	0	35	1	1
Supervisory Authorities and Institutions (FSA, CIPRO, ASP, GDT, GDT)	13	139	58	108	27
Car dealers	0	14	0	3	3
Non-profit organisations	0	0	45	0	0
Construction company	0	38	0	8	14
Private Pension Institute	0	0	5	1	1
<b>Total</b>	<b>401</b>	<b>699</b>	<b>689</b>	<b>628</b>	<b>596</b>



During 2017, financial institutions, mainly banks were on top of the list concerning the number of trainees. The main topics discussed in these trainings were:

- detection and analysis of anomalous transactions related to political parties;
- intensification of analysis of transactions and activity of clients considered of high risk;
- increased alertness to cash transactions, in the framework of fight against organised crime and especially trafficking of narcotic substances, but not only;
- measures against financing of terrorism, international sanctions against persons declared terrorists;
- drafting/reviewing of risk assessment by the reporting subjects and measures to address risks identified in the National Risk Assessment document.

The focus of the meetings and awareness raising of their role were even the authorities licensing and supervising subjects of law on the AML/CFT, which are informed of the problems encountered by the GDPML and the need to strengthen cooperation for a better preventive system in the country.

The table of these trainings points out the use of real estates as typology for money laundering, and CIPRO has been specifically requested to raise the level of diligence in identification of

anomalous transactions of exchange of real estates or their re-assessment. GDPML was focused on the distribution of the best national and international practices concerning anti-money laundering and combating of financing of terrorism, in order to increase the level of knowledge of reporting entities regarding their role in the preventive system.

In addition to participation in various training/awareness raising activities, during the on-site inspection process of 63 entities, the latter have been trained specifically, and recommendations have been made to improve their ML/FT prevention.

Given the deficiencies observed from off-site supervision, the reporting entities have been constantly instructed electronically, on the accuracy of the reporting aimed at further raising their awareness.

## Compliance analysis, on-site and off-site inspections

One of GDPML's main functions is supervision of the compliance of the reporting entities with the requirements of the AML/CFT legal acts. This is achieved through a combination of on-site and off-site inspections, processing and analysis of entities' reporting, as well as through cooperation with the supervisory authorities.

To ensure an adequate level of compliance, supervision is based on entities' categorisation, according to the AML/CFT risk level, focusing on those categories that are exposed to a greater extent to the laundering of proceeds of crime.

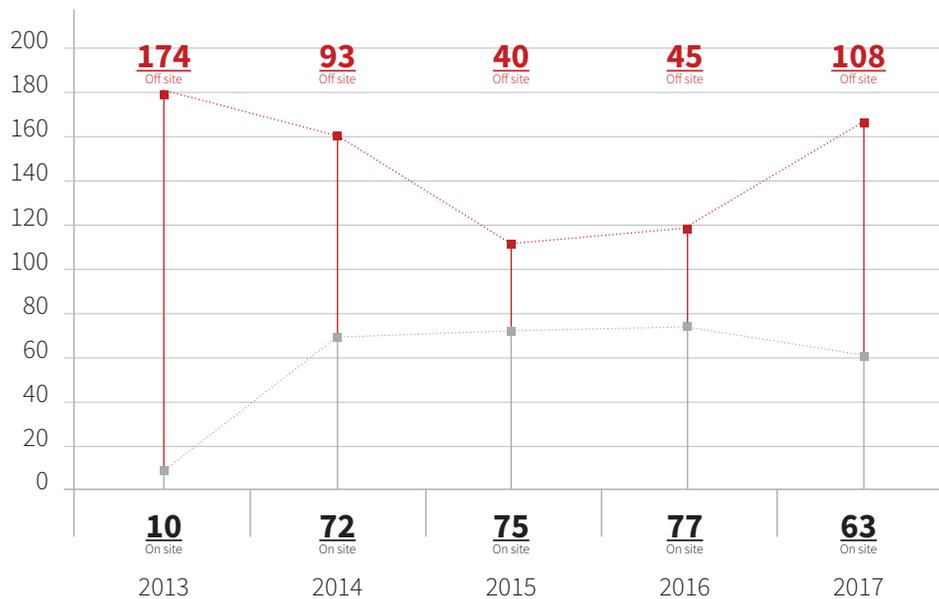
In 2017, GDPML has intensified its efforts to instruct the reporting entities, especially financial institutions *vis a vis* the individual ML/FT risk assessment, in relation to their customers, categories of services and products they provide in order to further strengthen and consolidate their preventive structure.

Coordination and cooperation with the supervisory authorities has continued to be of primary importance and in this context several mutual inspections of financial entities, have been conducted, in cooperation with the Bank of Albania (BoA) and the Financial Supervisory Authority (FSA).

Table 8: On-site and off-site inspection during 2013-2017.

No.	Inspected subjects	Year 2013		Year 2014		Year 2015		Year 2016		Year 2017	
		On-site	Off-site								
1	Banks	7		7		6	7	9		5	2
2	Non-bank financial institution			3	1	7	2	9		5	
3	Brokerage firm									1	
4	CEO	2	110	19	8	22	6	12	1	18	27
5	Accounting experts		27	3	16	5	1	1	1	3	9
6	Construction company		10	18		15	7	8	14	14	19
7	Car dealers			8	1			3	1		5
8	Notary public	1	19	4	67	13	1	21	28	6	17
9	Games of Chance			3			8	6		3	3
10	Life insurance and re-insurance			1		2		1		1	
11	Law firm					3					15
12	Securities trading and administering company						4				
13	Savings and Loan Association						4	2		1	
14	Transportation company					1					
15	Works of art					1					
16	Precious metals			3						1	
17	Real estate		8	2				4		3	5
18	Investment/Pension Fund							1		1	
19	Travel Agency			1						1	6
	Sub total	10	174	72	93	75	40	77	45	63	108
	Total	184		165		115		122		171	

Table 8: On-site and off-site inspection during 2013-2017.



Off-site supervision has become a priority during this year, whereby 108 out of 171 total inspections, are based on assessments and examinations of off-site compliance reports, that are regularly sent to the reporting entities. Considering limited resources available, GDPML has made use of the off-site inspection as an effective means of assessment of the compliance level of the subjects of the law. Overall, the number of inspected subjects has increased by 40% compared to the previous year.

The focus of inspections has been mainly on the entities considered to be of medium or high risk, that constitute 70% Police Prosecution Total 70% of the total number of inspections.

During the compliance analysis process in 2017, the following deficiencies are observed in the reporting entities:

- failure to report cash transactions above the threshold determined by law;
- failure to implement the measures of “enhanced diligence” for the category of clients considered to be of high risk
- failure to monitor business-client relationship;
- failure to maintain a centralised system responsible for data collection and analysis;
- failure to analyse complex, high value, unusual and economically unjustified transactions;
- non-identification of clients and failure to store these documents in accordance with the legal provisions;

Regarding these deficiencies, GDPML has continued the process of examination of the administrative offences, it has issued recommendations for the improvement of the situation by the subject and it has informed thereof the relevant supervisory authorities.

# NATIONAL AND INTERNATIONAL COOPERATION

## National inter-institutional cooperation

The success in combating the phenomenon of money laundering or financing of terrorism would not be possible without a cooperation and coordination of a high number of involved institutions, partner FIUs, but also private subjects.

GDPML has been fully committed in its capacity as the FIU to provide valuable support to the Police and Prosecution office.

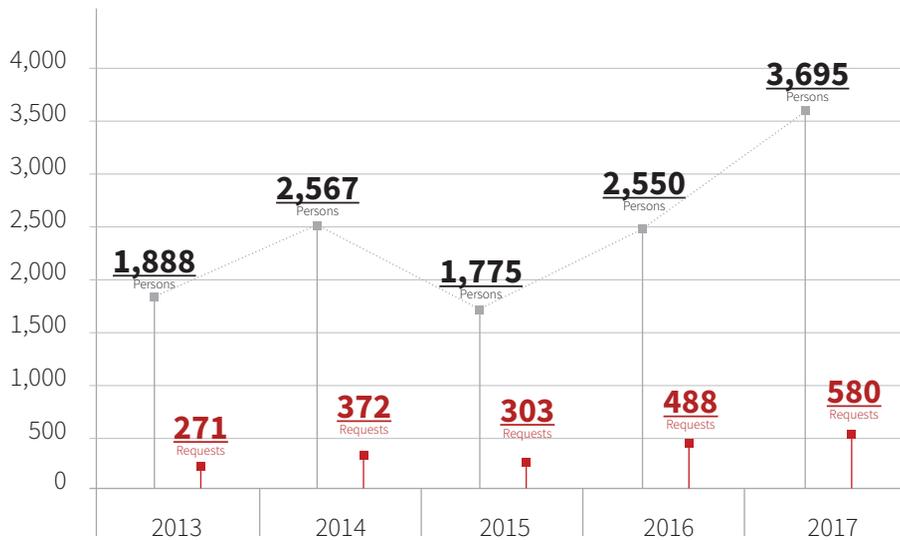
Therefore, GDPML has sent information to these institutions and it has served as solid basis for their work with most of cases investigated or proceeded against for money laundering, Moreover, during 2017 GDPML has collected information on 3700 persons/subjects based on the requests of the Police and Prosecution.

Table 9: Information on the incoming requests from the Police/Prosecution during 2013-2017

Years	Police		Prosecution		Total	
	No. requests	No. persons/Subjects	No. requests	No. persons/Subjects	No. requests	No. persons/Subjects
2013	79	726	192	1162	271	1888
2014	122	647	250	1920	372	2567
2015	154	765	149	1010	303	1775
2016	308	1415	180	1135	488	2550
2017	321	2497	259	1198	580	3695

The data above easily point out the fact that in 2017 there was a significant increase by 26% of information that GDPML has provided to these institutions. During the last 5 years, information on 12.475 persons/subjects has been made available, and this work has required the extraordinary commitment and dedication of the personnel and resources of the institution.

Graph 4: Requests for information by the Police/Prosecution Service during 2013-2017.



During this year, in addition to the exchange of information with the ASP and GPO, GDPML has resumed implementation of the cooperation agreement with HIDAACI in the framework of the fight against corruption and money laundering, by handling and replying to 181 requests concerning 677 persons/subjects.

Based on these data, it has to be underlined that in 2017 GDPML has verified and replied for 4372 persons/subjects for the agencies including: Police, Prosecution and HIDAACI.

Meanwhile, thanks to the extraordinary work and commitment of the majority of the GDPML personnel,

Importance has been paid even to cooperation with the GDC and GDT. On constant basis, there have been addressed issues concerning AML/CFT including:

- improvement and quality/quantity increase of SARs;
- increase of information exchange with the GDT in the framework of NPOs supervision;
- strengthening and cooperation of activities to lower the level of risk stemming from the use or physical transportation of cash ;
- risks posed by money laundering by use of trade instruments including import/export at fictitious pricing.

While trying to extend the basis of the institutions with which the GDPML cooperates and increase the sources of information, a cooperation agreement was signed in July 2017 with the Supreme State Audit. The aim of this agreement is to establish mutual cooperation through exchange of specific and useful information in order to fight corruption and money laundering or related activities.

within a very short period of one month, it has been completed the verification of 3000 persons/subjects in the framework of the vetting process within the judicial system.

Such data indicate an increase by over 350% of the information flow that the GDPML has made available to the law enforcement agencies and other institutions. These 7372 persons/subjects were checked in 2017 compared to the average of 2094 of the last 5 years. GDPML has had a fruitful cooperation with SIS about the direction of the mutual aspects of activity, protection of the financial system, fight against organised crime and prevention of radicalism and financing of terrorism.

## International cooperation

GDPML is regularly engaged in activities of EGMONT Group of the FIUs. Such activities, inter alia, focus on discussion of the challenges faced by the financial intelligence units in the world for the prevention of money laundering and financing of terrorism, the issues in the field of international cooperation and exchange of information or establishment of the Egmont Centre of FIU Excellence and Leadership (ECOFEL), etc.

## Regional cooperation

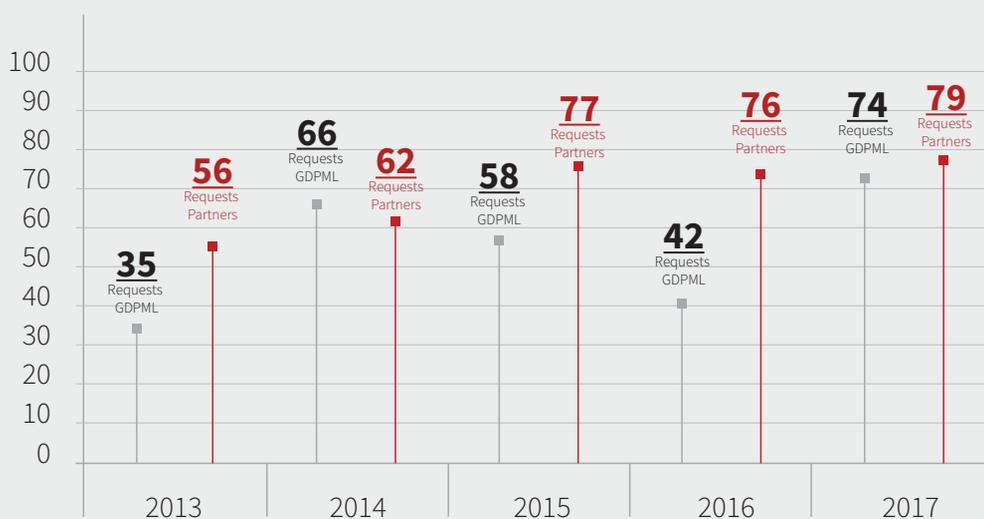
The annual meeting of FIUs of the region was organised in November 2017 in Slovenia to strengthen regional cooperation. FIU representatives from Bosnia-Herzegovina, Kosovo, Croatia, Montenegro, Macedonia, Serbia, Slovenia and Albania were participants therein. During this meeting there was discussion and exchange of experience concerning the typologies and new trends for the ML/FT, necessary legal amendments in the framework of MONEYVAL Committee evaluation processes etc.

## Exchange of information with FIUs

GDPML cooperation with the partner units, members of the EGMONT Group to exchange financial intelligence has been increasing, specifically with the UK FIU, Greece, USA, Italy, Belgium, Montenegro, the Netherlands and Kosovo.

Information exchange with the partners besides the requests or replies sent, has served as some indicia for the detection and filing of the suspicious cases to the law enforcement agencies.

Graph 5: Data on information exchange with partner FIUs during 2013-2017



As the graph above shows, information exchange of information with FIUs has been increasing in 2017. GDPML has paid special importance to this instrument, and specifically 74 requests have been made in 2017 compared to 42 requests of the previous year or compared to the average of 50 requests for the period 2013-2016.

Meanwhile, the incoming requests from the partners have maintained the same trend

# ADMINISTRATIVE MEASURES AND COURT PROCEEDINGS

## Administrative measures

Following the constant supervision by GDPML over the subjects of law concerning AML/CFT, where administrative offences are found, a fine has been imposed against the subjects in proportion to the level of the committed offence.

At the end of the process of analysis of compliance with the legal obligations, for 2017, there have been collected evidence and facts based on which 26 subjects have been proceeded against administratively and sentenced to a fine.



### Subjects

Banks

CEO

Notary public

Non-banking financial institutions

Games of Chance

Construction company

Travel Agency

Life Insurance Company

Car dealers

Total

Table 10: Number and value of fines (in ALL) by type by the sanctioned subjects (2013-2017).

	Year 2013		Year 2014		Year 2015		Year 2016		Year 2017	
	No. of Fines	Amount								
	2	8,500,000	5	4,430,000	2	6,000,000	5	10,700,000	5	17,000,000
	6	5,700,000	7	4,300,000	8	6,800,000	5	3,500,000	8	3'600'000
	5	1,700,000	29	9,700,000	4	2,700,000	11	3,400,000	2	1,000,000
	0	0	2	800,000	3	2,200,000	2	1,000,000	1	500,000
	0	0	3	2,500,000	0	0	4	3,600,000	1	500,000
	0	0	11	6,800,000	15	14,700,000	4	3,800,000	9	6,000,000
	0	0	0	0	1	300,000	0	0	0	0
	0	0	0	0	1	2,000,000	0	0	0	0
	0	0	0	0	0	0	2	4,000,000	0	0
	13	15,900,000	57	28,530,000	34	34,700,000	33	30,100,000	26	28,600,000

After reviewing the compliance reports prepared by the respective structures and confrontation with the opposite attitude of the reporting entities, the main offences over which they have been punished, consist in non-fulfilment of the obligation:

- to identify clients and store the identity documents;
- to monitor on regular basis the business relationship and data collection on the source of the funds;
- to set up and operate a centralised system for the collection and analysis of transactions;
- to report cash transactions.

The total value of the administrative measures imposed in 2017 is 28.6 million ALL, which is distributed among the banks, that have the highest share, of 5 measures amounting to 17 million ALL, followed by the construction companies, against which 9 measures have been imposed amounting to a total value of 6 million ALL. The minimum fine amounts to 300 000 ALL and the maximum fine amounts to 5 000 000 ALL.

## Execution of administrative measures and court proceedings

It was obvious that the imposition of the administrative measures would not produce the expected effects unless they were followed up to their final execution. Most of the administrative measures imposed by GDPML were executed voluntarily.

*Table 11: Disbursement data during 2013-2017*

Items	Year 2013	Year 2014	Year 2015	Year 2016	Year 2017
Decisions imposing fines	13	57	34	33	26
Total amount of fines in ALL	15 900 000	28 530 000	34 700 000	30 100 000	28 600 000
Total amount of disbursement in ALL	16 661 000	34 235 705	17 656 000	31 786 000	27 788 000

To increase the efficiency of administrative measures, the GDPML has followed the execution stages and it has requested information from the enforcement offices on the status and stage of mandatory execution.

Apart from the voluntary execution of administrative measures, there are subjects who challenge decisions before the court and GDPML follows these proceedings in its capacity as a party thereto.

# BUDGET, HUMAN RESOURCES AND INFORMATION TECHNOLOGY

## Budget and its management

The budget funds allocated to the GDPML have been managed efficiently, in line with the itemisation of the budget, according to the budgetary plan and the legislation in force. Moreover, the financial tables have been prepared and regular reporting is made in detail on the public procurement procedures and the intended objectives.

During 2017, the funds allocated by the State Budget amount to 64,750,000 ALL divided into :

- current expenses amounting to 61,750,000 ALL, executed to the extent of 82%;
- capital expenses amounting to 3,000,000 ALL, executed to the extent of 94.8%.

The graph below shows data concerning the execution of budgetary funds available throughout the years.

Graph 6: Execution of funds by the items of the budget during 2017



## Human resource management

GDPML's personnel increase has been requested insistently and continuously to ensure as effective and efficient organisation and functioning for the attainment of objectives of the Directorate based even on the primary objectives of the Government concerning anti-money laundering and combating of financing of terrorism.

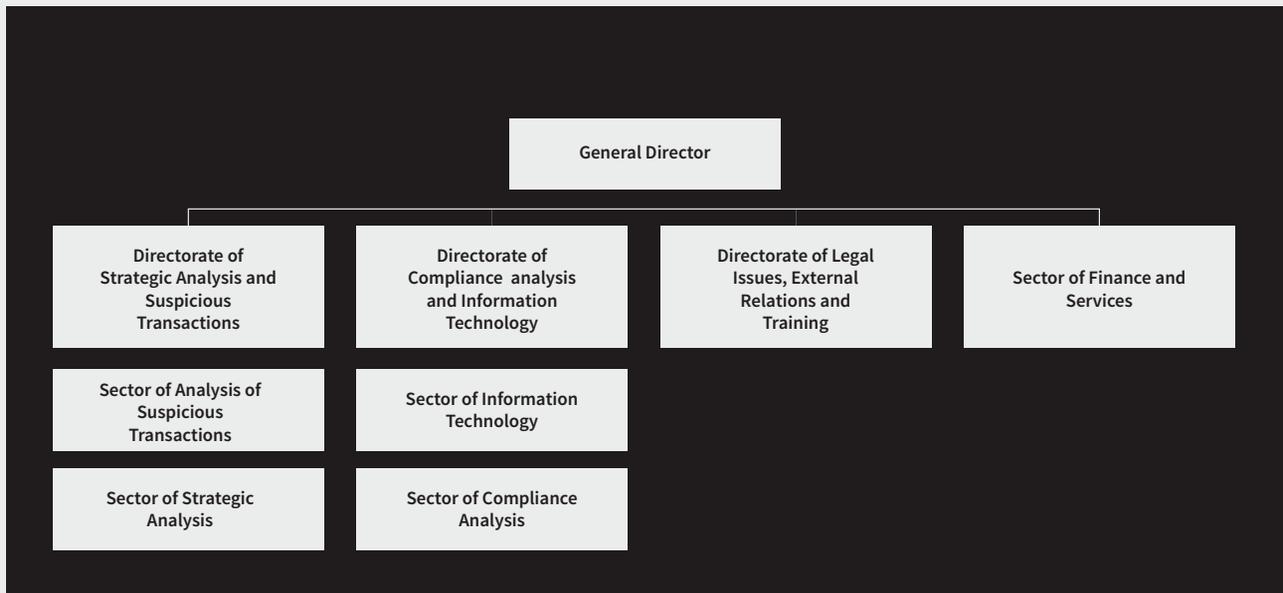
Following the Prime Minister's Order no.46, dated 12.04.2017 "On approval of the structure and organigram of the GDPML", 11 employees were added to the personnel and consequently the total personnel number is 39.

Such personnel addition is in line with the workload

increase in all respects: increase of number of SARs to be handled, increase of number of requests by the state cooperating institutions, increase of frequency of inspection of the reporting subjects and fulfilment of the legal obligations in the context of the justice reform.

Even though the new structure of the GDPML was adopted in April 2017, because of suspension of recruitment during the electoral campaign period, the procedures for admission of new personnel members was finalised by the end of the year.

GDPML organigramme



GDPML has provided for the professional personnel qualification and equipment with new AML/CFT knowledge, through various trainings in the country and abroad organised by CoE, UNODC, OSCE etc. In 2017, 13 GDPML employees were participants in 15 training activities in areas related to:

“Techniques of financial investigation”, “Tracing, seizure and confiscation of assets”, “Guidelines and indicia for cybercrime prevention”, “Analytical methods and techniques for investigation of money laundering and financing of terrorism”, “trafficking in human beings”, etc ;

## Information Technology

Capacity building of Information Technology has been one of the primary aspects of the work of the GDPML during 2017. In this context, filling vacancies of the head of IT sector and IT specialists, planning requests for equipment and timely implementation of respective procurement procedures in accordance with the legislation in force on information classified “state secret”, constant awareness raising of the reporting entities and securing information exchange have been of outmost importance.

Information collection, processing and storage has been managed thanks to close cooperation of IT specialists in the GDPML with their SIS colleagues. Special attention has been paid to the fulfilment of the respective security-related recommendations that serve as a basis to plan the needs and training on specific fields.

Inter-institutional cooperation with ASP, SIS and GDC has been another important element of GDPML’s work, aiming at timely and secure exchange of information on AML/CFT issues.

Data submitted by the reporting entities, occupy the vast majority of information collected and processed by the GDPML and therefore measures have been undertaken constantly to ensure the normal functioning of reporting modules by providing continuous technical support to these entities as well as users of several state institutions.

GDMPL cooperation at international level has identified the need to ensure the functioning of the mechanisms of secure information exchange with the partner FIUs, for which purpose constant supervision is conducted in line with the existing standards and practices of EGMONT group.

The means of electronic communication have been used to inform certain categories of reporting entities of ML/FT issues which are deemed of medium or high risk, in accordance with GDPML’s practices consolidated throughout the years.



# MAIN DATES

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- The Albanian Parliament, following the repeated requests of the Council of Europe and MONEYVAL Committee, passed, in May 2009, Law no.8610 dated 17.05.2000 “On the prevention of money laundering”;
- The Anti-Money Laundering Coordination Directorate in the Ministry of Finance was established for the first time in August 2001;
- The Albanian Financial Intelligence Unit becomes a full member of the EGMONT Group during the plenary session held in Australia in July 2003;
- The Anti-Money Laundering Coordination Directorate in August 2005 was raised to the level of the General Directorate of Prevention of Money Laundering, in the Ministry of Finance;
- In November 2006, the Parliament passed law no. 9641 dated 20.11.2006 “On ratification of the Council of Europe Convention “on the prevention of terrorism” and law no. 9646, dated 27.11.2006 “On ratification of the Council of Europe Convention “On laundering, search, seizure and confiscation of the proceeds from crime and on the financing of terrorism “;
- In May 2008, the Albanian Parliament passed law no. 9917, dated 19.05.2008 “On prevention of money laundering and financing of terrorism” which entered into force in September of the same year;
- In October 2009, the Decision of the Council of Ministers no. 1077 dated 27.10.2009 approved the National Strategic Document “On financial crime investigation” in which drafting the GDPML was the lead player;
- In April 2011, CoE MONEYVAL Committee approved the report of the 4th round for Albania, which reflects the positive evaluation concerning Recommendation 26 of FATF and which is linked directly to the activity of the GDPML as the Financial Intelligence Unit;
- The document on National Risk Assessment of Money Laundering and Financing of Terrorism was finalised and submitted to the AMLCC in October 2012.
- The Albanian Parliament passed law no.157/2013 “On measures against financing of terrorism” in October 2013
- In May 2015, Albania finalised the process of fulfilment of FATF recommendations and it was removed from the public list of countries with deficiency in the field of money laundering and financing of terrorism;
- The review of the national risk assessment for ML/FT, a document which was distributed to the respective institutions and authorities was finalised in June 2015;
- In September 2015, the CoE MONEYVAL Committee examined the progress made by the country in relation to the recommendations of the IV evaluation round and based on the measures taken by the authorities, it decided to interrupt the procedure of enhanced monitoring;
- In November 2016, the Decision of the Council of Minister approved through internal procedure the announcement of the list of terrorist persons.

# 2018 OBJECTIVES

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The efforts and work carried out during 2017 will serve as a starting point for the advancement of objectives set to combat money laundering and financing of terrorism. We are committed to improving further the legal framework, the regulations and procedures, as well as the work process of the GDPML.

In addition to the legal objectives of the GDPML that are part of the functional tasks of the institution, during 2018, special attention will be paid to:

- initiation of the review process of the National Risk Assessment;
- consolidation of the risk-based approach and coordination of work with the supervisory authorities;
- IT capacity building;
- follow-up and coordination of the evaluation process of Albania by CoE MONEYVAL Committee, as well as fulfilment of obligations deriving from such evaluation;
- contribution to the vetting process undertaken by the ASP.



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